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March 15, 2016

VIA ECF

Honorable P. Kevin Castel
United States District Judge
U.S. District Court for the Southern District
500 Pearl Street
New York, N.Y. 10013

Re: United States v. Han Cavan, 09 Cr. 1120 (PKC)

Judge Castel:

I am the attorney of record for Han Cavan, the defendant in the above-referenced matter pending before your Honor. On February 12, 2016, I filed a Motion to Dismiss the Indictment for failure to afford Mr. Cavan a Speedy Trial under the Sixth Amendment. On March 4, 2016, I received via ECF the Government's Memorandum in Opposition. My Memorandum in Reply was due yesterday, March 14, 2016. Although I expected to have my memorandum completed and filed yesterday, I was unable to do so despite working on it until 4:00 a.m. Accordingly, I request an extension to Friday, March 18, 2016, to file my Memorandum in Reply.

This is my first request for an extension of time in which to file my Memorandum in Reply. I have spoken to AUSA Edward Imperatore, counsel for the Government, and he has advised me that he has no objection to this request.

Sincerely,

/s/ Arnold J. Levine
Arnold J. Levine (AL6819)
Attorney for Defendant, Han Cavan

c: AUSA Edward Imperatore (by ECF)